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10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

13	ADAM J. CROSS,)	Case No.: 1:24-cv-00858-GSA
14)	
15	Plaintiff,)	STIPULATION FOR VOLUNTARY
16)	REMAND PURSUANT TO SENTENCE
17	v.)	FOUR OF 42 U.S.C. § 405(g)
18	COMMISSIONER OF SOCIAL SECURITY)	
19	Defendant.)	
20)	

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22 IT IS HEREBY STIPULATED, by and between the parties, through their undersigned
23 attorneys, and with the approval of the Court, that the Commissioner of Social Security has
24 agreed to a voluntary remand of this case pursuant to sentence four of 42 U.S.C. § 405(g). The
25 purpose of the remand is to offer Plaintiff a new decision.

26 On remand, the Commissioner will offer Plaintiff an opportunity for a hearing; further
27 develop the record as necessary; and issue a new decision. The parties further request that the
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1 Clerk of the Court be directed to enter a final judgment in favor of Plaintiff, and against
2 Defendant, reversing the final decision of the Commissioner.

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4 Respectfully submitted,

5 Dated: December 19, 2024

/s/ Melissa Newel *

(*as authorized via e-mail on 12/18/24)

MELISSA NEWEL

Attorney for Plaintiff

8
9 Dated: December 19, 2024

PHILLIP A. TALBERT

United States Attorney

10 By: /s/ Marcelo Illarmo

MARCELO ILLARMO

Special Assistant United States Attorney

13 Attorneys for Defendant
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ORDER

Based on the parties' Stipulation to Voluntary Remand Pursuant to Sentence Four of 42 U.S.C. § 405(g) and to Entry of Judgment ("Stipulation to Remand"), it is ORDERED that the this action is remanded to the Commissioner of Social Security for further proceedings consistent with the terms of the Stipulation to Remand.

The Clerk of Court is directed to enter a final judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

IT IS SO ORDERED.

Dated: **December 19, 2024**

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE